

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

Robert Manchel, Esquire
1 Eves Drive, Suite 111
Marlton, NJ 08053-3125
Attorney for Debtor
RM-1141

In Re:

Shaun J. Reiss

Case No. 18-25819MBK

Judge: Michael B. Kaplan

Chapter 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO

X CREDITOR'S MOTION or CERTIFICATION OF DEFAULT

TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT

The debtor in the above-captioned chapter 13 proceeding hereby objects to the following **(choose one)**:

1. ____ Motion for Relief from the Automatic Stay filed by ____, creditor. A hearing has been scheduled for ____, at ____ a.m.

OR

____ Motion to Dismiss filed by the Standing Chapter 13 Trustee. A hearing has been scheduled for ____ at ____ a.m.

OR

X Certification of Default filed by PNC Bank, NA, creditor. I am requesting that a hearing be scheduled on this matter.

OR

____ Certification of Default filed by Standing Chapter 13 Trustee. I am requesting that a hearing be scheduled on this matter.

2. I am objecting to the above for the following reasons (**choose one**):

_____ Payments have been made in the amount of \$_____, but have not been accounted for. Documentation in support is attached hereto.

OR

_____ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

OR

X Other: I am able to make a payment of \$10,000 by August 31, 2019, resume regular payments as of September 2019 and would like to capitalize the balance of the arrears through my bankruptcy plan. I respectfully request the court deny the movant's motion and allow me to continue and complete my bankruptcy plan.

3. This certification is being made in an effort to resolve the issues raised by the creditor in its motion.

4. I certify under penalty of perjury that the foregoing is true and correct.

Date: 8/14/2019

/s/ Shaun J. Reiss
Shaun J. Reiss, Debtor